

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Tatyna Petrosov**

Debtor

Case
No. **19-16061/amc**
Chapter **13**

**OBJECTIONS TO CERTIFICATION OF DEFAULT
OF NEWREZ, LLC, D/B/A SHELLPOINT MORTGAGE SERVICING**

Debtor, Tatyna Petrosov by her counsel,, Bradley E. Allen files this Objection to the Certification of Default of Movant, NewRez LLC, d/b/a Shellpoint Mortgage Servicing and avers the following:

1. Admitted.
2. Admitted.
3. Admitted
4. Admitted.

5. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.

6. Denied. It is specifically denied that Debtor is past due for \$2,510.84. To the contrary, debtor states that she made all of her post-petition mortgage payments subsequent to entering into the Stipulation. Debtor further states that she made most of her Stipulation payments, but not all of them. The reason is that Debtor states that she made mortgage payments earlier in her bankruptcy case which she did not receive credit for and which she has proof of the payments.

7. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.

WHEREFORE, Debtor, Tatyna Petrosov respectfully requests this Honorable Court to deny Movant, NewRez, LLC d/b/a Shellpoint Mortgage Servicing's Certification of Default of the Stipulation.

Respectfully submitted,

/s/Bradly E. Allen, Esquire
Attorney for Debtor, Tatyna Petrosov

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ORDER

AND NOW, this day of , 2023 upon Debtor's
Objections to Certification of Default of NewRez, LLC, d/b/a Shellpoint Mortgage
Servicing it is hereby

ORDERED that Movant's Certification of Default of NewRez LLC, d/b/a
Shellpoint Mortgage Servicing is denied.

HONORABLE ASHELY M. CHAN
U.S. BANKRUPTCY JUDGE